

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

HENRY LEE SIMS, JR., *et al*

Plaintiffs,

VS.

KIA MOTORS AMERICA, INC. and
KIA MOTORS CORPORATION,

Defendants.

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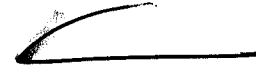
U.S. DISTRICT COURT NORTHERN DISTRICT OF TEXAS FILED MAR - 2 2015 CLERK, U.S. DISTRICT COURT By <u>W. S. [Signature]</u> Deputy

CASE NO. 4:14-cv-00045-A

**DEFENDANTS KIA MOTORS AMERICA, INC. AND KIA
MOTORS CORPORATION'S EXPERT WITNESS DESIGNATION**

COME NOW Defendants Kia Motors America, Inc. and Kia Motors Corporation ("Defendants") and in accordance with the Court's October 9, 2014 Order (Doc. No. 54), Defendants hereby make and serve their Expert Witness Designation:

Respectfully submitted,



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ATTORNEYS FOR DEFENDANTS

KIA MOTORS AMERICA, INC. AND KIA

MOTORS CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been forwarded to all known counsel of record in this cause in accordance with the Federal Rules of Civil Procedure on this 2nd day of March, 2015.



I.
RETAINED EXPERTS

1. Gregory C. Smith, P.E., Ph.D.
Collision Safety Engineering
416 S. Commerce Drive
Orem, UT 84058-5118
2. Jack Ridenour
Ridenour Engineering, PLLC
1100 N. Telegraph Road
Dearborn, MI 48126
3. Jeff D. Colwell, Ph.D., P.E.
Colwell Consulting
14614 N. Kierland Blvd.
Scottsdale, AZ 85254
4. Mike Klima
Design Research Engineering
46475 DeSoto Court
Novi, MI 48377
5. Dr. Sridhar Natarajan
Exponent
23445 North 19th Avenue
Phoenix, Arizona 850272
6. Jeya Padmanaban
JP Research Inc.
1975 West El Camino Real, Suite 300
Mountain View, California 94040

II.
NON RETAINED EXPERTS

Although none of the following are retained experts, to the extent their testimony might constitute expert testimony, Defendants also reserve the right to examine the following witnesses:

1. Detective Chris Gorrie
Fort Worth Police Department
350 W. Belknap Street

- Fort Worth, Texas 76102
817.392.4200
2. Officer J. Wilson
Sgt. Weber
Officer W. Simmons
Officer r. Brown
Officer J. Allen
Officer B. Jenkins
Officer T. Soria
Corporal S. LaCroix
Officer C. Collins
Officer S. Galegher
Officer C. Fields
Officer J. Trigo
Detective John Jenson
Lt. Pedro Criado
Fort Worth Police Department
350 W. Belknap Street
Fort Worth, Texas 76102
817.392.4200
3. Deputy Andres Gracciolo
Deputy Floyd Heckman, Jr.
Tarrant County Sheriff Office
100 E. Weatherford Street
Fort Worth, Texas 761996
817.884.1111
4. Brad Sims, Arson Investigator
Joe C. Boggs, Fire Fighter
Fort Worth Fire Department
715 Texas St.
Fort Worth, Texas 76102
817.392.6230
5. Lt. John S. Goodman
Jimmy Smith, fire fighter
Billie C. Johnson, paramedic
Dexter Waldrep, paramedic
Chris Groom, EMT
Azle Fire Department
900 Lakeview Drive
Azle, Texas 76020
817.444.7108
6. Dr. Nizam Peerwani
Tarrant County Medical Examiner
200 Feliks Gwozdz Place
Fort Worth, Texas 76104
817.920.5700

7. Robert Corley, Investigator
Steve White, Investigator
Tarrant County Medical Examiner's Office
200 Feliks Gwozdz Place
Fort Worth, Texas 76104
817.920.5700

III.

OTHER WITNESSES

1. Jae Hwa Park
Kia Motors Corporation
c/o Bowman and Brooke LLP
2501 North Harwood Street, Suite 1700
Dallas, Texas 75201

Mr. Park is a fact witness who has been presented as a corporate representative in this matter. The Kia Defendants believe Mr. Park's testimony is factual as opposed to expert opinion testimony. However, to the extent Mr. Park's deposition testimony in this case constitutes expert testimony; the Kia Defendants designate Mr. Park and his testimony as such.

2. Jeong Moon Jin
Kia Motors Corporation
c/o Bowman and Brooke LLP
2501 North Harwood Street, Suite 1700
Dallas, Texas 75201

Mr. Jin is a fact witness who has been presented as a corporate representative in this matter. The Kia Defendants believe Mr. Jin's testimony is factual as opposed to expert opinion testimony. However, to the extent Mr. Jin's deposition testimony in this case constitutes expert testimony; the Kia Defendants designate Mr. Jin and his testimony as such.

3. Choi Gu Lee
Kia Motors Corporation
c/o Bowman and Brooke LLP
2501 North Harwood Street, Suite 1700
Dallas, Texas 75201

Mr. Lee is a fact witness who has been presented as a corporate representative in this

matter. The Kia Defendants believe Mr. Lee's testimony is factual as opposed to expert opinion testimony. However, to the extent Mr. Lee's deposition testimony in this case constitutes expert testimony; the Kia Defendants designate Mr. Lee and his testimony as such.

4. Michelle Cameron
Kia Motors America, Inc.
Corporate Headquarters
111 Peters Canyon Road
Irvine, California 92606

Ms. Cameron is a fact witness who has been presented as a corporate representative in this matter. The Kia Defendants believe Ms. Cameron's testimony is factual as opposed to expert opinion testimony. However, to the extent Ms. Cameron's deposition testimony in this case constitutes expert testimony; the Kia Defendants designate Ms. Cameron and her testimony as such.

Defendants reserve the right to supplement this disclosure with additional designations of experts pursuant the Court's Scheduling Order and pursuant to the Federal Rules of Civil Procedure. Additionally, Defendants reserve the right to elicit any expert opinions or lay opinion testimony of retained and/or non-retained expert witnesses identified by Plaintiffs pursuant to the Court's Scheduling Order and pursuant to the Federal Rules of Civil Procedure.